## REMARKS

Reconsideration and allowance of this application are respectfully requested in view of the above amendment and the discussion below.

Applicants' invention is addressed to a device which is able to raise the withstand voltage by isolating the plurality of transistor from each other by use of a trench and connecting the plurality of transistors in series.

Independent claim 15 and dependent claim 18 are rejected under 35

U.S.C. 102 as anticipated by Yukutake et al. (WO 9844687), as detailed at item

7A on page 3 of the Patent Office Action. Claim 15 is also rejected under 35

U.S.C. 102 as anticipated by Nemoto et al. (WO 9966557) as detailed at item 7B

on page 4 of the Patent Office Action. Dependent claim 16 is rejected under 35

U.S.C. 103 as unpatentable over '557 in view of Miura, U.S. Patent No. 4,993,396

and dependent claim 17 is rejected over the combination of '557 in view of

Foerster, U.S. Patent No. 5,828,141.

Applicants respectfully traverse these rejections on the grounds that independent claim 15 provides structure which, as a whole, is not shown or disclosed or made obvious by the references or any combination of the references.

With respect to the rejection under 35 U.S.C. 102 as anticipated by Yukutake '687, Applicants submit that independent claim 15 provides features which are distinct from the construction shown in the '687 reference and additionally the objects of the present invention are distinct from the objects of the '687 reference.

More particularly, according to the present invention, a plurality of semiconductor elements are isolated by trenches as shown in the figures as item 4 which, as an example in Figure 2, shows the separation (isolation) of a semiconductor 2 from semiconductor 3.

The reference to Yukutake '687 on the other hand provides a line circuit including an LSI for a modem which is isolated from a host computer side circuit by a trench. Thus, although Yukutake shows a trench used for isolation, the circuit units of the '687 reference each contain a plurality of elements together and they are isolated from another plurality of elements by the trench. In contrast, according to the present invention, by forming the trench between semiconductor elements (transistors), each semiconductor element is individually isolated from the other semiconductor elements. Thus, when the semiconductor elements are connected in series, the withstand voltage can be raised. In contrast, the purpose of Yukutake is to decrease the number of parts, decrease the weight and the cost as well as prevent deterioration in the frequency band caused by an isolation transform which is eliminated according to Yukutake.

Therefore, it is submitted that there is a difference in structure between independent claim 15 and the reference to Yukutake and that this difference is not obvious to one ordinary skill in the art given the different objects of the present invention when contrasted with the reference to Yukutake.

The reference to Nemoto '557 concern circuit regions 2 and 3 with an insulating region 4 whose purpose is to isolate the first and second terminal

electrode 5. Once again, as in Yukutake, there is no individual isolation of a plurality of power semiconductor elements on an individual basis.

In order to more clearly emphasize the functional relationship between the elements, independent claim 15 has been amended to recite that the trench which isolates the plurality of power semiconductor elements functions so that "said plurality of semiconductor elements are individually isolated from each other".

Dependent claims 16 and 17 depend from independent claim 15 and the secondary references to Miura and Foerster, even accepting the statement of the rejection for their showings, adds nothing toward meeting the claim limitations of independent claim 15. These claims are thus also submitted as allowable.

Therefore, in view of the distinguishing features between the claimed invention and the references which features are not shown or disclosed or made obvious by the references or their combination, Applicants respectfully request that this application containing claims 15-18 be allowed and be passed to issue.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and

please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket #056207.50307C1).

Respectfully submitted,

Vincent J. Sunderdick Registration No. 29,004

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CROWELL & MORING LLP Intellectual Property Group P.O. Box 14300 Washington, DC 20044-4300 Telephone No.: (202) 624-2500 Facsimile No.: (202) 628-8844 VJS:vlc